

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

GEOGRAPHIC LOCATION INNOVATIONS LLC,

Plaintiff,

VS.

RELAX THE BACK CORPORATION,

Defendant.

Case No: 3:21-cv-00623-N

PATENT CASE

PLAINTIFF GEOGRAPHIC LOCATION INNOVATIONS, LLC'S
ANSWERS AND DEFENSES TO DEFENDANT
RELAX THE BACK CORPORATION'S COUNTERCLAIMS

Now comes Plaintiff, Geographic Location Innovations, LLC (“Plaintiff,” “Counterclaim Defendant,” or “GLI”), by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure 12, without admission of the legal sufficiency thereof and responding only to the factual allegations therein, and states as follows for its Answer and Defenses to Defendant and Counter Plaintiff Relax the Back Corporation’s (“Defendant,” “Counterclaim Plaintiff,” or “Relax the Back”) Counterclaims [Doc. 11] (hereafter the “Counterclaims”) as follows:

PARTIES

1. GLI has insufficient knowledge of the allegations contained in paragraph 1 and therefore denies same.

2. Admitted

JURISDICTION

3. GLI incorporates by reference each of its answers in paragraphs 1-2 above.
4. GLI admits that jurisdiction is proper.

5. Admitted.
6. GLI admits that venue is proper. GLI denies any remaining allegations in paragraph 6.

COUNT I

7. GLI incorporates by reference each of its answers in paragraphs 1-6 above.
8. GLI admits that an actual controversy exists concerning infringement of the '285 Patent. GLI denies any remaining allegations contained in paragraph 8.

9. Denied.

10. GLI admits that Relax the Back seeks a declaratory judgment. GLI denies any remaining allegations contained in paragraph 10.

COUNT II

11. GLI incorporates by reference each of its answers in paragraphs 1-10 above.
12. GLI admits that an actual controversy exists regarding validity of the '285 Patent. GLI denies any remaining allegations contained in paragraph 12.

13. Denied.

14. GLI admits that Relax the Back seeks a declaratory judgment. GLI denies any remaining allegations contained in paragraph 14.

PRAYER FOR RELIEF

To the extent a response is required, GLI denies that Relax the Back is entitled to any of the relief requested.

Dated: June 10, 2021

Respectfully submitted,

/s/Jay Johnson

JAY JOHNSON

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed electronically and served by operation of the Court's electronic filing system on June 10, 2021. Parties may access the foregoing through the Court's system.

/s/Jay Johnson

JAY JOHNSON